

EXHIBIT

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1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 Civil Action No. 1:16-cv-08879-VSB
5 - - - - -x
6 TINA MICHELLE BRAUNSTEIN,
7 Plaintiff,
8 -against-
9 SAHARA PLAZA, LLC, and THE PLAZA HOTEL,
a FAIRMONT MANAGED HOTEL,
10
11 Defendants.
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101 Park Avenue
New York, New York
September 7, 2017
10:41 a.m.

DEPOSITION of MARTIN MARIANO,
Non-Party Witness in the above-entitled
action, held at the above time and place,
taken before Cilia Civetta, a Shorthand
Reporter and Notary Public of the State of
New York, pursuant to Notice and the
Federal Rules of Civil Procedure.

* * *

<p style="text-align: right;">Page 2</p> <p>1</p> <p>2 A P P E A R A N C E S :</p> <p>3</p> <p>4 RAISER & KENNIFF, ESQS.</p> <p>5 Attorneys for Plaintiff</p> <p>6 300 Old Country Road, Suite 351</p> <p>7 Mineola, New York 11501</p> <p>8 BY: E. GORDON HAESLOOP, ESQ.</p> <p>9</p> <p>10</p> <p>11 SILLS CUMMIS & GROSS, P.C.</p> <p>12 Attorneys for Defendants</p> <p>13 One Riverfront Plaza</p> <p>14 Newark, New Jersey 07102</p> <p>15 BY: DAVID I. ROSEN, ESQ.</p> <p>16 SONU RAY, ESQ.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21 ALSO PRESENT:</p> <p>22 TINA MICHELLE BRAUNSTEIN</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1</p> <p>2 MARTIN MARIANO,</p> <p>3 having first been duly sworn by the</p> <p>4 Notary Public, was examined and testified</p> <p>5 as follows:</p> <p>6 MR. ROSEN: As you know, I</p> <p>7 represent the defendant in this</p> <p>8 matter. I believe that this deponent</p> <p>9 falls within a common control group</p> <p>10 and that I have attorney-client</p> <p>11 privilege.</p> <p>12 But in the event that there's</p> <p>13 any question about that, since we have</p> <p>14 no conflict of interest, I'm also</p> <p>15 appearing as counsel for the deponent.</p> <p>16 I just wanted you to know what</p> <p>17 my representation status is.</p> <p>18 MR. HAESLOOP: I'm glad you</p> <p>19 clarified it.</p> <p>20 EXAMINATION BY MR. HAESLOOP:</p> <p>21 Q. Good morning, Mr. Mariano.</p> <p>22 A. Good morning.</p> <p>23 Q. My name is Gordon Haesloop and</p> <p>24 with me is my client, Tina Braunstein.</p> <p>25 You've never met me before,</p>
<p style="text-align: right;">Page 3</p> <p>1</p> <p>2 S T I P U L A T I O N S</p> <p>3</p> <p>4 IT IS HEREBY STIPULATED AND AGREED, by</p> <p>5 and among counsel for the respective</p> <p>6 parties hereto, that the filing, sealing</p> <p>7 and certification of the within deposition</p> <p>8 shall be and the same are hereby waived;</p> <p>9 IT IS FURTHER STIPULATED AND AGREED</p> <p>10 that all objections, except as to form of</p> <p>11 the question, shall be reserved to the</p> <p>12 time of the trial;</p> <p>13 IT IS FURTHER STIPULATED AND AGREED</p> <p>14 that the within deposition may be signed</p> <p>15 before any Notary Public with the same</p> <p>16 force and effect as if signed and sworn to</p> <p>17 before the Court.</p> <p>18 * * *</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 M. MARIANO</p> <p>2 correct?</p> <p>3 A. That is correct.</p> <p>4 Q. But you have met Tina Braunstein</p> <p>5 before?</p> <p>6 A. Yes.</p> <p>7 Q. You worked together, correct?</p> <p>8 A. Yes.</p> <p>9 Q. What is your present address?</p> <p>10 A. My home address is 31-62 29th</p> <p>11 Street, in Astoria, New York 11106.</p> <p>12 Q. And how long have you lived</p> <p>13 there?</p> <p>14 A. About 25 years.</p> <p>15 Q. Would you tell me, please, your</p> <p>16 date of birth and place of birth?</p> <p>17 A. Sure. February 19, 1957. And I</p> <p>18 was born in Bristol, Connecticut.</p> <p>19 Q. And did you attend high school?</p> <p>20 A. Yes.</p> <p>21 Q. And where, please?</p> <p>22 A. Bristol Eastern High School.</p> <p>23 Q. And what year did you graduate?</p> <p>24 A. 1975, I think. It's been a long</p> <p>25 time.</p>

2 (Pages 2 - 5)

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1 M. MARIANO
2 A. Sure.
3 Q. And what would their complaints
4 be?
5 A. That, you know, the servers
6 were, you know, aggressive maybe. Or
7 their complaints could be hotel related.
8 You know, focusing more on the cocktail
9 program. They wanted to be really
10 involved in it.
11 They were terrific. I did not
12 hire them. They were already employees of
13 the hotel. They had come from the
14 Edwardian Room, and they were really
15 active in creating a program for the hotel
16 and that had slipped away.
17 So they were mostly -- most of
18 their complaints were that. They wanted
19 to be more creatively involved. You know,
20 and you just have squabbles between
21 employees, which is normal.
22 Q. And what kind of squabbles
23 between employees involving the two women,
24 Laura and Heather, in the Champagne and
25 Rose bars?

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1 M. MARIANO
2 A. Impatience, waiting your turn.
3 That's pretty much it. They were a good
4 team.
5 Q. Did they ever complain about any
6 of the male bartenders?
7 A. No.
8 Q. Did the male bartenders ever
9 complain about Heather?
10 A. No.
11 Q. Did they ever complain about
12 Laura?
13 A. No.
14 Q. That is, while you were present.
15 I mean, while you were employed.
16 A. Yes. They never complained
17 about Laura.
18 Q. What about the servers in those
19 bars?
20 A. Never.
21 Q. Now, did you participate in the
22 hiring of Tina Braunstein?
23 A. Yes.
24 Q. In what manner?
25 A. We were opening a new concept

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1 M. MARIANO
2 for a bar in the Palm Court and we needed
3 bartenders.
4 Q. Were those positions offered to
5 any of the bartenders in the Champagne or
6 Rose Room?
7 A. No.
8 Q. Why not?
9 A. Part of our agreement, which was
10 known as a concessionaire agreement, or
11 what we would say in layman terms, a
12 carve-out, was that the Palm Court would
13 be staffed by new hires, but the hotel had
14 a right to hire at will without going
15 through the union hall or without allowing
16 current employees in the hotel to seek
17 those positions.
18 Q. Were those positions posted
19 within the hotel?
20 A. No.
21 Q. Why not?
22 A. Because they weren't eligible
23 for the jobs.
24 Q. And who decided eligibility?
25 A. The agreement between the hotel

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1 M. MARIANO
2 and the union.
3 Q. Now, how many seats are in the
4 Champagne Room at the bar?
5 A. Four.
6 Q. And in the Rose?
7 A. Maybe twelve.
8 Q. And are there tables?
9 A. Yes.
10 Q. With chairs?
11 A. Yes.
12 Q. How many tables and chairs in
13 each?
14 A. About 50, 60 seats in each room.
15 Q. When the Palm Court opened, it
16 had what kind of configuration?
17 A. It was a bar in the center of
18 the room surrounded by tables.
19 Q. What was the configuration of
20 the bar?
21 A. It was --
22 Q. Square, rectangle?
23 A. -- oval.
24 Q. How many seats at the bar?
25 A. I think there were 14, maybe 18

24 (Pages 90 - 93)

<p style="text-align: right;">Page 178</p> <p>1 M. MARIANO</p> <p>2 points reads: Martin -- that's you,</p> <p>3 correct?</p> <p>4 A. Correct.</p> <p>5 Q. -- I followed up with Tina when</p> <p>6 she returned to work to explain to her the</p> <p>7 JP is the general manager. How she does</p> <p>8 not know this is confusing. She has</p> <p>9 worked with him for over six weeks now. I</p> <p>10 further explained that Luigi is a union</p> <p>11 delegate and he was asked by Edmund to</p> <p>12 witness and arbitrate the situation. I</p> <p>13 told her I was investigating the incident</p> <p>14 and we needed to speak to everyone</p> <p>15 involved.</p> <p>16 A. Mm-hmm.</p> <p>17 MR. ROSEN: You have to answer</p> <p>18 him yes or no. You can't say mm-hmm.</p> <p>19 Q. Did you write that?</p> <p>20 A. Yes.</p> <p>21 Q. But it doesn't indicate anywhere</p> <p>22 in the memo identified as Plaintiff's 3</p> <p>23 that you informed her of what Edmund said</p> <p>24 and as to whether she had any response.</p> <p>25 A. I think it's implied that I</p>	<p style="text-align: right;">Page 180</p> <p>1 M. MARIANO</p> <p>2 A. No.</p> <p>3 Q. Do you know, as you sit here</p> <p>4 today, if Edwin was not involved in the</p> <p>5 situation, why you took it upon yourself</p> <p>6 to interview him as part of that report</p> <p>7 marked Exhibit 3?</p> <p>8 A. Because clearly Edwin was a part</p> <p>9 of the situation. Just because she didn't</p> <p>10 note that in her e-mail doesn't mean he</p> <p>11 wasn't a part of it.</p> <p>12 So I'm going to make an</p> <p>13 assumption that in speaking with Edmund,</p> <p>14 he told me that Edwin was a witness. So I</p> <p>15 spoke to Edwin, because I do a thorough</p> <p>16 investigation and I speak to everybody.</p> <p>17 Q. Well, did you speak to Edwin</p> <p>18 about what he witnessed?</p> <p>19 A. Yes.</p> <p>20 Q. I spoke to Edwin. He confirmed</p> <p>21 that Tina was aggressive, bossy, used foul</p> <p>22 language. He said she made a comment</p> <p>23 about getting an attorney. He was very</p> <p>24 concerned and claimed she's not been</p> <p>25 getting along with the other staff. He</p>
<p style="text-align: right;">Page 179</p> <p>1 M. MARIANO</p> <p>2 followed up with Tina. So I'm certain I</p> <p>3 would have shared that information with</p> <p>4 her.</p> <p>5 Q. But it's not contained in the</p> <p>6 memo?</p> <p>7 A. Not in this memo, no.</p> <p>8 Q. Did that memo go to HR?</p> <p>9 A. I don't know who it went to.</p> <p>10 Q. Do you recall sending it to HR?</p> <p>11 A. No.</p> <p>12 Q. If it had been sent to HR, would</p> <p>13 it be something in the HR file?</p> <p>14 A. I don't know. I'm not the</p> <p>15 director of HR. I don't know.</p> <p>16 Q. The bottom page says, I spoke to</p> <p>17 Edwin.</p> <p>18 Now, was Edwin involved in this</p> <p>19 situation?</p> <p>20 (Witness reviews document.)</p> <p>21 A. I don't know.</p> <p>22 Q. Well, in Tina's e-mail, which is</p> <p>23 No. 2, does she refer in any way to Edwin</p> <p>24 being present?</p> <p>25 (Witness reviews document.)</p>	<p style="text-align: right;">Page 181</p> <p>1 M. MARIANO</p> <p>2 asked to confidential because he doesn't</p> <p>3 want problems with her.</p> <p>4 Did he describe to you what</p> <p>5 problems he thought he might have?</p> <p>6 A. Yes.</p> <p>7 Q. What problems?</p> <p>8 A. That she was aggressive with him</p> <p>9 and Roberto and that she was a bully, and</p> <p>10 that she would never help them in the</p> <p>11 service bar. They felt that she would set</p> <p>12 them up for failure, wasn't supportive.</p> <p>13 The ladies would wait for</p> <p>14 cocktails all the time and she just would</p> <p>15 stay at her station in the bar, talking to</p> <p>16 customers in the bar, and wouldn't help.</p> <p>17 Q. Is that recorded anywhere in the</p> <p>18 memo?</p> <p>19 A. No. That's my recollection of</p> <p>20 what was going on at the time.</p> <p>21 Q. And what else do you recollect</p> <p>22 that she told you?</p> <p>23 MR. ROSEN: Are you asking about</p> <p>24 she told him --</p> <p>25 MR. HAESLOOP: Tina.</p>

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<p style="text-align: right;">Page 238</p> <p>1 M. MARIANO</p> <p>2 benefits manager. So just for future</p> <p>3 e-mail reference, that she should be</p> <p>4 copying Evan Hunt, who was the more</p> <p>5 appropriate person to handle her</p> <p>6 situation.</p> <p>7 Q. And that explains 9; that</p> <p>8 explained why you sent the e-mail to Evan</p> <p>9 Hunt, Exhibit 10?</p> <p>10 A. Correct. So in Exhibit 10,</p> <p>11 which is dated January 25, I remind Evan</p> <p>12 that I met with Tina; that we had a very</p> <p>13 candid conversation about her performance</p> <p>14 review on January 15.</p> <p>15 And in that meeting, I reminded</p> <p>16 her that the review is a snapshot; and</p> <p>17 even though she was upset with the</p> <p>18 comments that she did not meet the</p> <p>19 expectations, that I felt it was my</p> <p>20 responsibility to have a candid</p> <p>21 conversation with her and really let her</p> <p>22 know what the large concerns were, as I</p> <p>23 understood them.</p> <p>24 Q. Understood. But why did you</p> <p>25 send that e-mail to Mr. Hunt?</p>	<p style="text-align: right;">Page 240</p> <p>1 M. MARIANO</p> <p>2 pattern of repeated concerns that she</p> <p>3 wasn't getting along with her coworkers,</p> <p>4 always acting professionally.</p> <p>5 After my repeated receipt of</p> <p>6 e-mails and offering to meet with Tina and</p> <p>7 having candid conversations with Tina, I</p> <p>8 didn't feel that Tina was taking ownership</p> <p>9 to do any kind of self-reflection to try</p> <p>10 to change any of the issues that were a</p> <p>11 concern.</p> <p>12 There was never a concern with</p> <p>13 the technical aspects of her job or her</p> <p>14 knowledge. That's a given. But it just</p> <p>15 began to escalate that the bartenders</p> <p>16 within themselves felt that Tina was a</p> <p>17 bully. That she wasn't doing her share of</p> <p>18 the work.</p> <p>19 The cocktail servers felt she</p> <p>20 was negligent in helping out whoever was</p> <p>21 on the service bar. They weren't getting</p> <p>22 along with her as well. I felt I did</p> <p>23 everything I could to try to help. I felt</p> <p>24 Tina and I had a really good working</p> <p>25 relationship, and I felt that I was always</p>
<p style="text-align: right;">Page 239</p> <p>1 M. MARIANO</p> <p>2 (Witness reviews document.)</p> <p>3 A. Because on January 12 I offered</p> <p>4 to meet with Tina. And in the e-mail I</p> <p>5 sent to Evan Hunt, I'm letting him know</p> <p>6 that I met with Tina, that I followed up.</p> <p>7 Q. Thank you.</p> <p>8 You were asked a question</p> <p>9 whether you were present when Ms.</p> <p>10 Braunstein was informed that she was being</p> <p>11 terminated, and I believe your answer was</p> <p>12 no. Am I correct?</p> <p>13 A. Yes.</p> <p>14 Q. Were you part of the decision to</p> <p>15 terminate Ms. Braunstein's employment?</p> <p>16 A. Yes.</p> <p>17 Q. Are you familiar with the</p> <p>18 reasons why Ms. Braunstein's employment</p> <p>19 was terminated?</p> <p>20 A. Yes.</p> <p>21 Q. Can you tell us what those</p> <p>22 reasons were?</p> <p>23 A. That since her hire date of</p> <p>24 October and the opening of the Palm Court</p> <p>25 in November, mid-November, she had a</p>	<p style="text-align: right;">Page 241</p> <p>1 M. MARIANO</p> <p>2 open to her and that we could discuss</p> <p>3 things candidly and professionally amongst</p> <p>4 each other.</p> <p>5 And so I was really</p> <p>6 disappointed. I couldn't get her to move</p> <p>7 to a point where they could say, you know,</p> <p>8 she's going to make it. And I think from</p> <p>9 October to February, that's almost five</p> <p>10 months of looking at an employee during a</p> <p>11 probationary period, where I'm not seeing</p> <p>12 any willingness to change.</p> <p>13 In fact, in one of these e-mails</p> <p>14 that you presented to me, she brags to me</p> <p>15 about being a tough person from New York,</p> <p>16 and she seems to be very proud of the fact</p> <p>17 that she's confrontational with people and</p> <p>18 that's who she is and that we have to</p> <p>19 accept that. And in a luxury hotel, where</p> <p>20 respect amongst employees is important,</p> <p>21 she didn't have it in her nature to want</p> <p>22 to change.</p> <p>23 So at that point I didn't see</p> <p>24 any further need to continue to coach and</p> <p>25 counsel her, either on the record or</p>

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<p style="text-align: right;">Page 242</p> <p>1 M. MARIANO</p> <p>2 through written documentation. And I felt</p> <p>3 it was in the hotel's best interest to</p> <p>4 exercise their right to end a relationship</p> <p>5 with an employee during her probationary</p> <p>6 period for failing to meet the standards</p> <p>7 and expectations of the hotel.</p> <p>8 Q. Okay. Now, you mentioned a</p> <p>9 number of different people who were</p> <p>10 female, who expressed complaints to you</p> <p>11 about Ms. Braunstein, correct?</p> <p>12 A. Yes.</p> <p>13 Q. Now, you were asked whether you</p> <p>14 had reduced those to writing, and I</p> <p>15 believe that you said no.</p> <p>16 But can you tell us, to the best</p> <p>17 of your memory, what did you understand or</p> <p>18 what do you recall the substance of Ms.</p> <p>19 Merlo's complaint about Ms. Braunstein to</p> <p>20 be? That would be Carolyn Merlo.</p> <p>21 A. Carolyn's complaint was more</p> <p>22 vague. It's sort of like, I'm not on that</p> <p>23 shift; it's not really my oversight to</p> <p>24 worry about, but I'm glad I don't have to</p> <p>25 deal with it, because she felt Tina was a</p>	<p style="text-align: right;">Page 244</p> <p>1 M. MARIANO</p> <p>2 Q. Now, you said there were female</p> <p>3 cocktail servers. Do you recall the names</p> <p>4 of any of those servers?</p> <p>5 A. I don't recall the name of --</p> <p>6 there was one server who's the delegate.</p> <p>7 I can't remember her name. She had dark</p> <p>8 hair. We allowed her to wear flat shoes</p> <p>9 because her feet hurt her. I remember</p> <p>10 that. And her uniform itched her and we</p> <p>11 made some adjustments to it. But I can't</p> <p>12 recall her name.</p> <p>13 Q. How many servers do you recall</p> <p>14 complaining about Ms. Braunstein?</p> <p>15 A. About four.</p> <p>16 Q. Were they all female?</p> <p>17 A. Yes.</p> <p>18 Q. Now, there was another woman</p> <p>19 after the cocktail servers and before the</p> <p>20 wife of, I think, one of the owners. And</p> <p>21 I didn't write that name down.</p> <p>22 A. Yes.</p> <p>23 Q. Do you know who I'm referring</p> <p>24 to?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 243</p> <p>1 M. MARIANO</p> <p>2 problem.</p> <p>3 Q. And what was the position that</p> <p>4 Carolyn held there?</p> <p>5 A. Carolyn was a manager.</p> <p>6 Q. Now, I believe that you said</p> <p>7 that you also received complaints from the</p> <p>8 cocktail servers. You already recited</p> <p>9 some of the complaints.</p> <p>10 Were there any other complaints</p> <p>11 by the servers that you can recall them</p> <p>12 making about Ms. Braunstein other than not</p> <p>13 helping out?</p> <p>14 A. Just witnessing certain things</p> <p>15 and just her, you know, being</p> <p>16 uncooperative. They felt Tina was jealous</p> <p>17 of them or didn't understand why she would</p> <p>18 be unwilling to help.</p> <p>19 Whenever there's a line at the</p> <p>20 bar, why with three bartenders she</p> <p>21 wouldn't jump in and assist the service</p> <p>22 bartenders. She would often, basically,</p> <p>23 let them drown, which they felt impacted</p> <p>24 their ability to service tables. Just no</p> <p>25 vested interest in their success.</p>	<p style="text-align: right;">Page 245</p> <p>1 M. MARIANO</p> <p>2 Q. What's that person's name?</p> <p>3 A. Angelina Policrasti.</p> <p>4 Q. And who was she?</p> <p>5 A. She was brought in by Geoffrey</p> <p>6 Zakarian as a wine and beverage</p> <p>7 consultant. She assisted us on all the</p> <p>8 bars with developing the wine list, and</p> <p>9 she did extensive training.</p> <p>10 We actually kept her on as an</p> <p>11 additional support because she did all of</p> <p>12 the service training for all of the</p> <p>13 bartenders and the servers, along with</p> <p>14 Brian, who was primarily cocktail driven,</p> <p>15 but she was wine driven and service</p> <p>16 driven.</p> <p>17 Q. And what do you recall the</p> <p>18 substance was of her complaints about Ms.</p> <p>19 Braunstein?</p> <p>20 A. Nothing specific except a</p> <p>21 recommendation to let her go and, like,</p> <p>22 weekly. She's like, you need to let her</p> <p>23 go, you need to let her go. And I didn't</p> <p>24 think that was fair because I think</p> <p>25 everyone has an opportunity to change or</p>

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1 M. MARIANO
2 get better and I invested a lot of time.
3 And like I said, Tina and I had
4 a good relationship. She raised some
5 valid issues that we were able to take
6 care of. She raised her disappointments,
7 and we were able to talk them through. So
8 I thought I could make some headway.
9 Q. Did Angelina ever give any
10 indication as to why she thought Ms.
11 Braunstein should be terminated?
12 A. There were -- I think there were
13 concerns for me. I think she felt that I
14 wasn't reacting, and she was hearing from
15 the Zakarian group that I was being,
16 perhaps, ineffective.
17 And I needed them to understand
18 that this is not an independent restaurant
19 where you get to just say, you know, I
20 don't like you and you have to leave
21 today. This is a different environment.
22 This is The Plaza. We have to follow a
23 process, and everyone deserves time to
24 adjust.
25 It was a challenging time of

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1 M. MARIANO
2 performance. So there were going to
3 be challenging times that we just kind of
4 had to work through and talk through. But
5 at the end of the day, I think they just
6 felt that Tina wasn't really making an
7 effort.
8 Q. Okay. The wife of whom? I
9 didn't write the name down.
10 A. Geoffrey Zakarian, who was the
11 culinary chef. His wife was sort of a
12 self-appointed expert. I think she's a
13 vested interest in his group. She's a
14 partner of his. And she would raise, you
15 know, concerns.
16 Q. Such as?
17 A. Just things that she would hear
18 from the staff or observations. I will
19 say that at the bar, there weren't
20 concerns at the bar with the customers at
21 the bar. It was how it was affecting the
22 floor.
23 Q. Can you explain that more fully?
24 A. Yes. So Tina would have
25 customers at the bar. She would take very

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1 M. MARIANO
2 good care of them. That's, you know,
3 money that goes directly into her pocket.
4 She was able to make very good
5 engagement with them, and I think she felt
6 she did a very good job there and I would
7 agree.
8 Q. But what was the wife of
9 Zakarian's concerns?
10 A. Just what was happening on the
11 floor. There was another person they
12 involved. Her name is Monica Saperstein.
13 She was brought on as a restaurant
14 operational consultant. She had done some
15 work for Geoffrey before. And she
16 assisted us with everything, on how the
17 hostess stand flowed, how the reservations
18 flowed, how the bar flowed, the flow of
19 service on the floor. And she would make
20 some observations that she was concerned
21 for me, that I needed to react and end the
22 relationship.
23 Q. With whom?
24 A. With Tina.
25 Q. Do you recall anything else that

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1 M. MARIANO
2 she said to you about Ms. Braunstein?
3 A. I'm not sure I understand the
4 question.
5 Q. You just said that she was
6 concerned about you and that you needed to
7 end the relationship with Tina.
8 So my question to you was, do
9 you recall anything else that she may have
10 said concerning the reasons why she felt
11 you needed to end that relationship?
12 A. She had told me that she felt
13 that Tina was familiar; that she may have
14 recognized her.
15 Q. What does that mean?
16 A. That she said, I know her from
17 somewhere or I worked with her somewhere
18 before. And then she said something
19 about, like, I know her from someplace.
20 MR. ROSEN: Okay. I have no
21 further questions.
22 BY MR. HAESLOOP:
23 Q. Did she ever tell you where she
24 worked with Tina before?
25 A. No.